

10/10/2021

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

Vs.

**Sarai Izaguirre
Carlos Cruz-Garcia**

CRIMINAL COMPLAINT

Case Number: C-21-1266M

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about October 8, 2021 in Kenedy County, in the

(Date)

Southern District of Texas, defendant,

**Sarai Izaguirre
Carlos Cruz-Garcia**

each aiding, abetting and assisting one another, did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

Official Title

See Attached Affidavit of U.S. Border Patrol Agent

David Stone

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:

October 10, 2021

Date

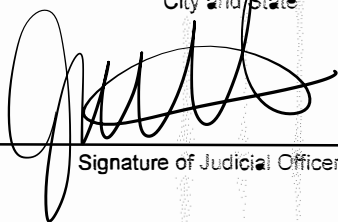
at

Corpus Christi, Texas

City and State

Julie K. Hampton U.S. Magistrate Judge

Name and Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

SYNOPSIS:

On October 8, 2021, Sarai IZAGUIRRE and Carlos CRUZ-Garcia were arrested north of the Sarita, Texas Border Patrol Checkpoint attempting to smuggle 6 illegal aliens.

ENCOUNTER:

At approximately 8:30 p.m., Border Patrol Agents assigned to the Sarita, Texas Border Patrol Checkpoint were informed that a group people were north of the checkpoint trying to wave down traffic on the highway. As agents approached the group, they were informed the subjects were entering a vehicle that pulled over on the side of the road.

Agents arrived and observed an Acura sedan parked at the group's location. Agents observed a female, later identified as Sarai IZAGUIRRE, closing the trunk of the Acura with a person inside. The front seat passenger, later identified as Carlos CRUZ-Garcia, attempted to abscond into the brush but was apprehended. Agents interviewed the occupants of the vehicle, and it was determined that all subjects except IZAGUIRRE were illegally present in the United States.

All subjects were taken into custody and transported to the checkpoint for further processing. It was determined that CRUZ-Garcia, the subject that attempted to flee, was the brush guide for the group that guided them around the checkpoint.

MIRANDA RIGHTS

IZAGUIRRE and CRUZ were read their Miranda Rights in the English language. Subjects stated they understood their rights and were willing to provide statements without the presence of an attorney.

The material witness was read his Miranda Rights in his preferred language of Spanish. Subject stated he understood his rights and was willing to provide a statement without the presence of an attorney.

PRINCIPAL STATEMENT (Sarai IZAGUIRRE)

IZAGUIRRE confessed to alien smuggling, stating she needed money to pay for her aunt's funeral. IZAGUIRRE stated she was getting paid \$600 per alien. IZAGUIRRE stated she was on the phone with the brush guide, and he flashed a light at her from the brush to signal her to stop.

CO-PRINCIPAL STATEMENT (Carlos CRUZ-Garcia)

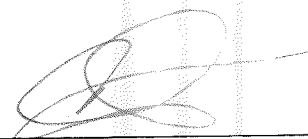
CRUZ confessed to being the brush guide for the group. CRUZ stated he was getting paid \$1,500 per alien to guide them around the checkpoint. CRUZ stated he spoke with the driver that picked them up on the phone and once she arrived at the location, they entered her vehicle just before being arrested.

MAT/WIT STATEMENT (Edgar SILVA-Quintana)

SILVA stated he was dropped off with a group on the side of the road in order to circumvent the checkpoint. SILVA stated the brush guide for the group was aggressive toward the aliens and would push them around. Once they arrived at a location near the highway, the guide informed them a vehicle was coming to pick them up. Once the vehicle arrived, they entered, and the driver began driving but stopped to put one of the aliens in the trunk. At that point Border Patrol arrived and they were arrested. SILVA was shown photo lineups and positively identified Sarai IZAGUIRRE as the driver and Carlos CRUZ-Garcia as the brush guide.

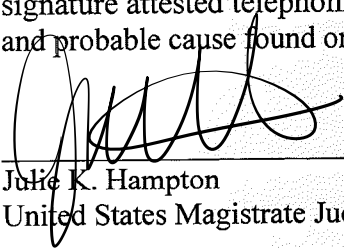
DISPOSITION:

The case was accepted by the Assistant United States Attorney's Office against Sarai IZAGUIRRE and Carlos CRUZ-Garcia for prosecution of Title 8 USC 1324, Alien Smuggling. Edgar SILVA-Quintana will be held as a material witness in this case.



David Stone
Border Patrol Agent

Submitted by reliable electronic means, sworn to,
signature attested telephonically per Fed.R.Crim.P.4.1,
and probable cause found on October 10, 2021.



Julie K. Hampton
United States Magistrate Judge